

TYNEMOUTH AREA RESIDENT'S ASSOCIATION (TARA) RESPONSE TO

- **HARINGEY AREA ACTION PLANS Regulation 18 Consultation Document, and**
- **HARINGEY'S SITE ALLOCATION DEVELOPMENT PLAN DOCUMENT Regulation 18 Consultation Document**

Tynemouth Area Residents' Association members live in the roads bounded by the ex-/gyratory system in Tottenham N15. The location and extent of the proposed plans and developments are, therefore, of major significance to our neighbourhood and community.

Overview of Consultation

The AAP Reg 18 Consultation Document, page 11, omitted Tottenham from the list of public consultation meetings. Although this was later addressed by a public consultation meeting held by the Council on 17th February 2014, it gave us considerably less time than other areas to consider our responses to these complex proposals. In our view, this omission gives some indication of the misguided perceptions of Tottenham. This is further reinforced by the stated commitment in the AAP to *transforming Tottenham into a successful place where people want to live, work and visit*. Our experience of Tottenham is that it is already an interesting and exciting place to live where people of diverse backgrounds and cultures share and participate in a wide range of activities, many community-led, and where we live happily in a spirit of co-operation and generosity, and welcome visitors to enjoy our activities and neighbourhoods. We are proud to live here, what we contribute to our communities and how we help each other.

We consider the AAPs to be a means to facilitate developer-led plans that have no interest in the prevailing and future needs and aspirations of local people and businesses. The overall extent of the AAP would be to condemn Tottenham to years of upheaval and uncertainty, and large swathes of the area will be relegated to the condition of a building site.

Guiding Principles

1. The *Potential Development Capacity and Design Principles* of sites are excessive, overwhelming and dense; residential buildings are too high and do not offer the opportunity to develop viable local communities. Residential blocks should not exceed 6 storeys, and then only where this does not overwhelm the character and architecture of existing local neighbourhoods.
2. The land issues noted in the *Built Environment Snapshot* are of major concern. Development benefits from *high public land ownership and low land values* must accrue to existing/future local residents and communities rather than excessive profits to developers.
3. Compulsory Purchase Orders of residential or business properties must not result in owners being priced out of the opportunity to remain living and/or trading in

- the area. They must be offered equal or improved facilities on or near to their original location by developers.
4. Most sites are situated on the Flood Plain, and are at medium/high level threats of flooding and with some Critical Drainage Areas. No sites should be designated for development before an independent Flood Risk Assessment to the whole Tottenham Action Plan Area is carried out.
 5. Several areas within the Tottenham AAP are listed as being subject to noise pollution and poor air quality which can only be increased by such vastly increased business, town centre and residential use. Any development plans must demonstrate that they will meet the current European air quality legislation as well as noise pollution limitations.
 6. In order to ascertain the full combined effect of all the developments, an Environmental Impact Assessment must be carried out covering the whole of the Tottenham Action Plan Area, rather than piecemeal on individual sites. This should include the potential impact on nearby RAMSAR, SSSI and SPA sites on the Lee Valley and Walthamstow Reservoirs.
 7. All development must be built to the highest sustainable standards to reduce environmental impact.
 8. Tottenham has a large number of high quality existing houses and buildings which form a substantial part of neighbourhood character. Any heritage or high standard buildings must be preserved within the new plans. Buildings that are of significant local merit should be retained and added to a list of such buildings.
 9. In addition to the above we confirm our commitment to the application of the Guiding Principles of the Our Tottenham Planning Policy Working Group (Appendix 1) for all sites in the Tottenham AAP.

Social infrastructure

Government statistics show that several Tottenham wards have the highest population densities in the Borough. The AAP gives no indication of the effect of 10000 new homes on the already deficient social infrastructure needed to sustain additional 20000+ residents (our own calculations suggest that this figure could be substantially higher).

Health

There are existing critical deficits in Tottenham's health infrastructure at current population levels. Health needs are acknowledged to be some of the highest in the country. Plans do not address the infrastructure required to meet the current needs as well as the needs of an additional 20000+ residents in Tottenham. Recent developments at Hale Village and the Newlon estate at Tottenham Town Hall have substantially

increased the population levels without commensurate capacity in health infrastructure (Hale Village plans to provide a health centre failed to materialise) and we must not see this situation repeated. Our only local GP practice, Tynemouth Road Medical Centre is already pushed to the limits and local residents find it difficult to get appointments. The practice was instructed to take on patients from Hale Village and Ferry Lane Estate (where the GP retired about 4 years ago and has not been replaced).

The Kings Fund Report, General Practice in London, Dec. 2012, shows that Tottenham GP's have 22.2 percent more patients on their lists, on average, than London GPs in general. Therefore, Tottenham has a deficit of one fifth of the GPs required for current population levels. Furthermore, it is unclear under the 2012 NHS legislation as to who is responsible for ensuring that sufficient GPs are set up in areas of major new housing developments. Prior to any plans being agreed, the Council must be able to demonstrate that the health needs of the current population will be met, and that high quality, accessible health facilities will be available to meet the needs of the increased population resulting from any developments.

Education

As with health provision, the Hale Village development failed to provide the education facilities that were incorporated into the plans for the site. The expansion of Welbourne School has created capacity to help meet current needs but at the cost of valuable green amenity space.

Haringey Council's school planning documents acknowledge the great difficulty that will be experienced in providing adequate education places for 6000 new units in the area. 10000 units will, therefore, present even greater difficulties. These matters must be adequately addressed prior to any plan being agreed.

Green Open Space

There is an acknowledged deficit in green space in Tottenham – children's play areas, sporting pitches and nature conservation areas. Haringey Council has yet to meet its stated *high* and *immediate* commitment to provide such space (The London Borough of Haringey Open Space Strategy - Action Plan (in November 2005)). The AAP would need to make provision to meet this current commitment as well as providing the additional green open space to meet the needs of the 20000+ population growth anticipated in the AAP.

Amenity Space Within Developments

Provision must be made for high quality, safe and secure amenity space/play areas for children within developments. Balconies should be excluded from this definition.

Traffic & Parking

Most parking in South Tottenham is on the street so parking spaces are already at a premium. Such a large influx of people will put huge strain on this. It would also introduce a large number of new cars and heavy vehicles to an area that already suffers from high traffic congestion and the associated pollution and noise problems.

Broad Lane, now undergoing improvements to decrease traffic and create a residential environment, would provide entrance/exit points for huge developments on Tottenham Retail Park leading to vastly increased business and residential road usage. Access to other sites around Broad Lane will similarly increase traffic flow through Broad Lane. Therefore, car-free zones must be implemented in all residential developments.

Developments of Specific Interest to TARA:

We have identified five developments that would have substantial and immediate impact on our area. These developments are subject to our Guiding Principals above, as well as those listed in Appendix 1

TH1 - Tottenham Hale Retail Park

The current buildings and usage of the site is viable, and should therefore not normally be subject to a special Site Allocation for Development. However an argument for exception could be made in this case. The site in its current form was created relatively recently and does not integrate with the general form or character of Tottenham.

At the time of this development there was considerable community-led interest in providing housing on the site with a link to Ferry Lane Estate. Site Allocation for Development should include housing that would compliment the form and character of the Ferry Lane Estate and that of the Victorian houses on the opposite side of Broad Lane.

With the narrowing of Broad Lane to provide a residential environment, this area is no longer equipped to deal with heavy traffic flow. However the large numbers of shops and residential buildings proposed for this development means a substantial increase in heavy traffic and should, therefore be a car-free zone.

If this site is earmarked for future development any such development should conform to the Guiding Principles set out above.

TH3 - Station Square West

The northern part of the site consists of viable buildings and usage and should therefore not be subject to a Site Allocation.

The southern part of this site is historically very poorly designed, and could be

redeveloped (including the removal of traffic access through the site and the creation of a public square).

Any future development should conform to the Guiding Principles set out above.

THR5 - Kwik Fit Site

With residential and family developments being proposed here, provision must be made for a high quality play facilities for children that would also serve other existing developments along Monument Way. The height of buildings must not exceed that of adjacent blocks of flats.

The opening up of the blocked street on this site would be a positive change.

Any future development should conform to the Guiding Principles set out above.

TH8 - South Tottenham Industrial Area

Parts of this area are neglected and run down and improvements to this site are necessary. Many of the buildings are viable and are currently occupied, making a valuable contribution to the local community.

The site consists mostly of viable buildings and usage and should therefore not be subject to a Site Allocation.

Any future development should conform to the Guiding Principles set out above..

TH9 - Welbourne Centre & Monument Way

This site consists of a green corridor adjacent to Chestnuts Housing Estate and the site of the Caribbean Senior Citizens Welbourne Community Centre (now demolished).

Since the community centre was a popular and well-used facility before demolition, this site should provide a multi-purpose community facility.

The green corridor is used by children as an informal play area and has no buildings. It provides a shield for the housing estate from the heavy traffic along Monument Way. This must be retained and enhanced to offset the green space deficit

This site should therefore not be subject to a Site Allocation.

Tynemouth Area Resident's Association

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Appendix 1

Our Tottenham Planning Policy Working Group

Some Guiding Principles

Under Design Principles, proposals for each site should:

1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey). It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.
2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)
3. In Tottenham, conform to the Community Charter for Tottenham
4. Conform to best practice for similar sites around the UK and Europe
5. All new housing on the site should be high quality and genuinely affordable:
 - An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.
 - A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least ‘London Housing Design Guide 2010’ standards ie Parker Morris standards plus 10% more space - and to outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; It protects and enhances the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.
 - As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing in the various neighbourhoods should be respected and all new housing sites should conform to such patterns.
6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible
7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.
8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.

9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria
10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list
11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.
12. Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.
13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.

Under Implementation considerations, proposals for each site should:

- a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.
- b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby
- c. Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.
- d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 mths shall be set aside to enable such a Plan to be developed before any further action is taken
- e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships

Under Potential Development Capacity, proposals for each site should include:

Community and social infrastructure figures